

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Gowon D. Younger,

Defendant.

Case:4:20-cr-20092

Judge: Leitman, Matthew F.

MJ: Hluchaniuk, Michael J.

Filed: 02-19-2020 At 12:09 PM

SEALED MATTER (sk)

Violation:

18 U.S.C. § 922(g)(1)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

**18 U.S.C. § 922(g)(1) - Felon in Possession of a Firearm**

1. On or about January 12, 2020, in the Eastern District of Michigan, defendant, Gowon D. Younger, after having been convicted of a crime punishable by a term of imprisonment exceeding one year, a felony offense, and knowing that he had been previously convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm, that is, a Smith & Wesson, Model SD40VE, .40 caliber, semi-automatic pistol.

All in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**  
**18 U.S.C. § 924(d) and 28 U.S.C. § 2461**

2. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461.

3. Upon conviction of the offense charged in Count One of this Indictment, Defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461, any firearm or ammunition involved in said offense including but not limited to: a Smith & Wesson, Model SD40VE, .40 caliber semi-automatic pistol, s/n: DSD5102, and 14 rounds of .40 caliber ammunition.

4. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL  
s/Grand Jury Foreperson  

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GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

*s/Anthony Vance*

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ANTHONY VANCE  
Chief, Branch Offices

*s/Blaine Longworth*

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BLAINE LONGSWORTH  
Assistant United States Attorney

Dated: 2-19-2020

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United States District Court  
 Eastern District of Michigan

Criminal Case C

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b>

Case Title: USA v. Gowon D. YoungerCounty where offense occurred: Genesee

Offense Type: Felony

Indictment -- no prior complaint

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

Reason:

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

February 19, 2020

Date

**s/ Blaine Longsworth**

Blaine Longsworth  
 Assistant United States Attorney  
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 (810) 766-5177  
 Bar #: P55984

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.